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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 07-cv-05944 (SC)
MDL No. 1917

This Document Relates to:

Sharp Electronics Corp., et al. v. Hitachi, Ltd., et al.,
Case No. 13-cv-1173 SC;

and

Sharp Electronics Corp., et al. v. Koninklijke Philips Electronics N.V., et al., Case No. 13-cv-2776 SC.

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF SHARP
ELECTRONICS CORPORATION
AND SHARP ELECTRONICS
MANUFACTURING COMPANY
OF AMERICA, INC.'S
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL
RE: TOSHIBA'S MOTION IN
LIMINE TO EXCLUDE EVIDENCE
OF TOSHIBA'S SALES TO SHARP
CORPORATION**

1 I, Craig A. Benson, hereby declare as follows:

2 1. I am a Partner with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel
3 for Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America,
4 Inc. (collectively, “the Sharp Plaintiffs”). I am a member of the bars of the State of Maryland, the State
5 of New York, and the District of Columbia, and I am admitted to practice before this Court *pro hac vice*.

6 2. I submit this Declaration in support of Sharp Electronics Corporation and Sharp Electronics
7 Manufacturing Company of America, Inc.’s Administrative Motion to File Documents Under Seal. I
8 have personal knowledge of the matters set forth herein and, if called as a witness, I could and would
9 testify competently to them.

10 3. Pursuant to Civil Local Rules 7-11, 79-5(b), and 79-5(e), Sharp Electronics Corporation and
11 Sharp Electronics Manufacturing Company of America, Inc., by and through counsel, respectfully
12 request an Order permitting them to file under seal portions of Sharp Electronics Corporation and Sharp
13 Electronics Manufacturing Company of America, Inc.’s Opposition to the Toshiba Defendants’ Motion
14 in Limine to Exclude Evidence of Toshiba’s Sales to Sharp Corporation, filed contemporaneously
15 herewith, and Exhibits 1-4 of the Declaration of Craig A. Benson in Support of Sharp Electronics
16 Corporation and Sharp Electronics Manufacturing Company of America, Inc.’s Opposition to the
17 Toshiba Defendants’ Motion in Limine to Exclude Evidence of Toshiba’s Sales to Sharp Corporation.

18 4. Attached as Exhibit 1 is a true and correct copy of a certified translation of the document
19 produced at Bates number MTPD-0024384, designated by MT Picture Display Co., Ltd. as Confidential.

20 5. Attached as Exhibit 2 is a true and correct copy of the document produced at Bates number
21 PHLP-CRT-014272, designated by Koninklijke Philips N.V. as Confidential.

22 6. Attached as Exhibit 3 is a true and correct copy of a certified translation of the document
23 produced at Bates number CHU00028229, designated by Chunghwa Picture Tubes, Ltd. as Confidential.

24 7. Attached as Exhibit 4 is a true and correct copy of a relevant excerpt from the deposition of
25 Dr. Jerry A. Hausman, dated July 23, 2014, designated by the Sharp Plaintiffs as Confidential.

26 8. Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America,
27 Inc.’s Opposition to the Toshiba Defendants’ Motion in Limine to Exclude Evidence of Toshiba’s Sales

1 to Sharp Corporation and Exhibits 1-4 refer to or contain excerpts from documents that producing
2 parties have designated as "Confidential" under the Stipulated Protective Order [Docket Nos. 306,
3 1142].

4 9. Accordingly, Sharp Electronics Corporation and Sharp Electronics Manufacturing Company
5 of America, Inc. request that the documents identified herein be filed under seal.
6

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Executed this 27th day of February, 2015, in Washington, DC.
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10 /s/ Craig A. Benson
Craig A. Benson
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